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February 24, 2022

**VIA ECF**

Honorable Joan M. Azrack  
United States District Judge  
United States District Court  
Eastern District of New York  
100 Federal Plaza  
Central Islip, NY 11722

Re: *Ajay Bahl v. New York College of Osteopathic Medicine of New York  
Institute of Technology, et al.*, 14-CV-04020 (JMA)(ARL)

Dear Judge Azrack:

This firm represents Defendant New York Institute of Technology (“NYIT”), improperly named herein as New York College of Osteopathic Medicine of New York Institute of Technology, in the above-referenced action. We write to respectfully request a two-business-day adjournment of NYIT’s current February 25, 2022 deadline to serve its motion for summary judgment, through Tuesday, March 1, 2022. We apologize for needing to make this request. Key client personnel are out of the office over the next two days, and they require additional time to finalize their review of the draft motion papers before service.

We have conferred with Plaintiff’s counsel, Gregory Tsonis, Esq., who advised that he consents to NYIT’s adjournment request and the following proposed amended briefing schedule:

- NYIT’s deadline to serve its summary judgment motion, extended to Tuesday, March 1, 2022;
- Plaintiff’s deadline to oppose summary judgment, extended to Tuesday, May 3, 2022; and
- NYIT’s deadline to serve its reply brief, extended to Tuesday, May 31, 2022.

Thank you for Your Honor’s consideration of our request.

**CLIFTON BUDD & DEMARIA, LLP**


Honorable Joan M. Azrack

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Respectfully Submitted,

CLIFTON BUDD & DEMARIA, LLP  
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By:   
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cc: Mr. Gregory Tsonsis (via e-mail)